NICHOLAS A. TRUTANICH United States Attorney District of Nevada Nevada Bar Number 13644 3 BRIAN W. IRVIN Assistant United States Attorney 501 Las Vegas Blvd. So., Suite 1100 Las Vegas, Nevada 89101 (702) 388-6336 5 Brian.irvin@usdoj.gov 6 Attorneys for the United States 7 UNITED STATES DISTRICT COURT 8 DISTRICT OF NEVADA Pamela Brown, Individually, and as Case No. 2:20-cv-01814-GMN-DJA Special Administratrix of the Estate of 10 James Brown, Stipulation to Extend the United States' Deadline to Answer Plaintiff, 11 (Second Request) ٧. 12 United States of America, 13 Defendant. 14 Pursuant to Local Rule IA 6-1, Defendant United States of America requests a 30-15 day extension of time to file an answer or otherwise respond to Plaintiff's Complaint. 16 (ECF No. 1). Based on the last stipulation by the parties (ECF No. 10), the answer or 17 other response is due by December 21, 2020. With the extension, the new deadline to 18 answer or otherwise respond would be January 20, 2021. This is the United States' 19 second request for extension. 20 This is a wrongful death claim brought under the Federal Tort Claims Act 21 ("FTCA"). Given the nature of this action, counsel for the United States must review the 22 decedent's medical records before responding to the allegations in the Complaint. 23 Counsel for the United States is still awaiting records from the agency. Counsel for the 24

1	United States does not believe it will take more than 30 days to obtain the records and	
2	prepare an answer. Counsel for the United States has discussed this matter with counsel	
3	for Plaintiff. The parties agree to the proposed 30-day extension.	
4	WHEREFORE, the United States respectfully requests that this stipulation be	
5	granted and that the answer or other response be made due by January 20, 2021.	
6 7	Respectfully submitted this 18th day of December 2020.	
8	LAIRD LAW, PLLC	NICHOLAS A. TRUTANICH United States Attorney
9 10 11	/s/ Danial O. Laird DANIAL O. LAIRD, ESQ. 8991 West Flamingo Road, Suite C Las Vegas, Nevada 89147	/s/ Brian W. Irvin BRIAN W. IRVIN Assistant United States Attorney
12	Attorney for Plaintiff	Attorneys for the United States
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15	IT IS SO ORDERED:	
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18		NEL J. ALBREGTS TED STATES MAGISTRATE JUDGE
19		December 21, 2020
20	DAT	TED:
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